


RE: Polymetal Finishing Springfield MA - MAR053413

Wednesday, October 03, 2018 1:26 PM

Subject	RE: Polymetal Finishing Springfield MA - MAR053413
From	Handler, Neil
To	Canzano, Joseph
Cc	Kudarauskas, Elizabeth A.; Dart, Denny; McDonald, Marie; Boisclair, Diane; Kopf, Jeff
Sent	Wednesday, October 03, 2018 11:15 AM
Attachments	 MSGP_DM RData_9_...

Joe,

You always no how to pick them!

The interesting thing here is that this facility never came up on our 308 radar because they were timely submitting their DMRs. However, the issue appears to be that this facility was submitting a number of its DMRs with the NODI code "8 – Other (See Comments)" which ICIS does not recognize as a valid code. So when a facility submits an entire DMR using the NODI 8 code – its flagged the same as a DMR non-receipt.

Ive attached a copy of the facilities DMR Data (Joe, also put a copy in the K share folder you created).

In reviewing the data in the DMR summary report, it looks like the facility has met the MSGP requirement of having four quarters of data the average of which is below the respective benchmark for some of its parameters and the facility is mistakenly using the NODI code 8 to indicate that it has ceased monitoring for these parameters. For example if you look at Outfall 003-11, which contains the monitoring requirements for iron, aluminum and total total nitrite/nitrate, the facility has 4 quarters of data during 2016, the average of which is below the respective benchmark for each of these parameters. The facility started submitting its DMRs with the NODI 8 code after it completed the 4 quarters of monitoring in 2016.

If iron, aluminum and total total nitrite/nitrate were the only monitoring requirements for Outfall 003, then the proper step for this facility would have been to submit a Change NOI to EPA to request that all monitoring for the outfall be eliminated. However, there is an additional parameter associated with Outfall 003 – its 003-ZA which is for the monitoring for zinc. Unfortunately the facility has not met the criteria of having the average for zinc be below its benchmark so the facility cannot submit a Change NOI. Instead the facility must still complete the DMR each quarter for Outfall 003-11 but it can use the NODI code "A – General Permit Exemption" (instead of NODI 8) to explain why it has ceased sampling for this outfall.

Another problem I am noticing is that the facility should not have stopped monitoring for Outfall 003-ZA (as well as several others). If you look at the average value for zinc over the 4 quarters where the sampling occurred in 2016 you will see that the average is 0.05 mg/L which is above the benchmark criteria of 0.04 mg/L. So the facility stopped monitoring when it shouldn't. I noticed the same thing occurred for Outfall 002-ZA and 004-ZA.

Probably a lot to digest here, so feel free to stop by if you want to discuss.

Thanks,

Neil

From: Canzano, Joseph

Sent: Wednesday, October 03, 2018 7:49 AM

To: Handler, Neil <Handler.Neil@epa.gov>; Boisclair, Diane <boisclair.diane@epa.gov>; McDonald, Marie <mcdonald.marie@epa.gov>

Cc: Kudarauskas, Elizabeth A. <Kudarauskas.Beth@epa.gov>

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Neil, Diane and/or Marie.

I'm not sure who I should ask between the three of you about this, so I sent it to all.

Have we sent any letters to this facility for potential reported violations?
If so, can you tell me where the file is with documents?

Three-Year Compliance History by Quarter



Statute	Program/Pollutant/Violation Type			QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+ ⓘ
	CWA (Source ID: MAR053413)			07/01-09/30/15	10/01-12/31/15	01/01-03/31/16	04/01-06/30/16	07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/28/18
	Facility-Level Status			No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	SNC/Cat 1	SNC/Cat 1	SNC/Cat 1	Und
	SNC/RNC History											R(Resolved)	D(DMR NR)	D(DMR NR)	D(DMR NR)	
	Benchmark Limit Exceedances (No Violation): Pollutant ⓘ	Disch Point	Freq													
CWA	Aluminum, total [as Al]	001	NMth				60%									
CWA	Nitrite Plus Nitrate Total	001	NMth			38%	62%		100%	62%	503%	440%	18%	76%		
CWA	Zinc, total [as Zn]	001	NMth			250%	200%	60%	13%	20%		450%	53%			
CWA	Aluminum, total [as Al]	002	NMth				60%									
CWA	Nitrite Plus Nitrate Total	002	NMth				62%		91%	62%	503%	397%	12%	76%		
CWA	Zinc, total [as Zn]	002	NMth			80%	200%	55%				8,350%				
CWA	Aluminum, total [as Al]	003	NMth			47%										
CWA	Zinc, total [as Zn]	003	NMth			53%	95%									
CWA	Zinc, total [as Zn]	004	NMth				100%		575%							

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